

**BEFORE THE
FEDERAL COMMUNICATIONS Commission
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 1, 21, 73, 74 and 101 of the)	WT Docket No. 03-66
Commission's Rules to Facilitate the Provision of)	RM-10586
Fixed and Mobile Broadband Access,)	
Educational and Other Advanced Services in the)	
2150-2162 and 2500-2690 MHz Bands)	

**SUPPORT FOR PETITION FOR RECONSIDERATION OF WIRELESS
COMMUNICATIONS ASSOCIATION INTERNATIONAL,
INC.REGARDING SIMULTANEOUS USE OF 2.1 GHz and 2.5 GHz BANDS**

SpeedNet, L.L.C. ("SpeedNet"), hereby advocates its support to the Petition For Reconsideration filed by the Wireless Communications Association International, Inc. ("WCA") on June 9, 2008 ("WCA Petitions"), in the above-referenced proceeding ("Third Reconsideration Order")¹ regarding the simultaneous use of the 2.1 GHz and the 2.5 GHz channels while migrating subscribers from 2.1 GHz spectrum to the new post-transition band plan on the 2.5 GHz spectrum.

SpeedNet holds several Broadband Radio Service ("BRS") licenses issued by the Federal Communications Commission ("FCC") and is operating on BRS-1 licenses in the following Michigan markets: Alpena (B011), Petoskey (B345), Traverse City (B446), Bad Axe (B390) and Saginaw

¹ *Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands*, Third Order on Reconsideration and Sixth Memorandum Opinion and Order and Fourth Memorandum Opinion and Order and Second Further Notice of Proposed Rulemaking and Declaratory Ruling, 23 FCC Rcd 5992 (2008), 73 Fed. Reg. 26032 (May 8, 2008).

(WMI833 and WMI947). Some of these markets provide service to as many as 5,000 customers.²

SpeedNet has been using the 2.1 GHz band to provide this data service and has been approached by the AWS-1 entrant regarding migration of SpeedNet's customers to the 2.5 GHz band. However, such migration is not possible without the ability to simultaneously use both the 2.1 GHz and 2.5 GHz bands while transitioning customers. In order to make this transition, SpeedNet must obtain new equipment to operate on the 2.5 GHz band, as its current equipment is only engineered to perform on the 2.1 GHz band. Then SpeedNet must visit every customer to update their equipment accordingly to ensure that they will receive service from the new transmitting equipment. It is also likely SpeedNet will have to locate new tower sites in order to maintain its number of subscribers. Considering the number of subscribers being served by SpeedNet, this will be a lengthy and painstaking process.

As the Commission is aware, the migration of the 2.5 MHz spectrum to the new band plan, which must be completed by October 21, 2010, has a shorter timeline than migration of the 2.1 GHz spectrum to the 2.5 GHz band, which has a sunset date of November 28, 2022. Therefore, the Commission did not anticipate that the 2.1 GHz transition would be completed concurrently with the relocation of 2.5 GHz spectrum to its new bandplan and should allow continued operation on the 2.1 GHz band even after the 2.5 GHz spectrum in a particular market has been transitioned until migration of all customers on the 2.1 GHz band have been relocated.

² SpeedNet also made the required FCC filings regarding these stations in December 2005 and July 2006 indicating its subscriber numbers and technical equipment being used.

Accordingly, SpeedNet advocates its support for the arguments and relief requested in the WCA's Petition for Reconsideration and hopes the FCC reconsiders its position on these important matters.

Respectfully submitted,

SpeedNet, L.L.C.

By /s/ John Ogren
John Ogren
Partner and CEO

June 30, 2008